Eastern Plating Company, Inc.

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April 14, 2009

Jeanna Henry Office of Land Enforcement Land and Chemicals Division 1650 Arch Street Philadelphia, PA 19103-2029

Hello Jeanna -

Per your request in our meeting last week, the Hazardous Waste Operations Training Manual is enclosed. It was used for our Level 2 and Level 3 Hazardous Waste Training.

Thanks,

Michael W. Castor General Manager

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Michael & Cota

EASTERN PLATING

Hazardous Waste Operations Training

EASTERN PLATING HAZARDOUS WASTE OPERATIONS Training Course Outline

29 CRF 1910.120

- 1.0 General Hazardous Waste Operations
- 2.0 RCRA Operations
 - 1. Storage
 - 2. Disposal
 - 3. Accumulation
- 3.0 Emergency Response
- 4.0 Video
- 5.0 Training Levels
- 6.0 Generator Requirements
- 7.0 Types of Hazardous Waste
 - 1. Listed
 - 2. Characteristic
 - 3. Universal
- 8.0 Summary

EASTERN PLATING HAZARDOUS WASTE OPERATIONS Training Course Outline

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Why is HW Determination Important?

- Required by 40 CFR PART 261
- ✓ Determines HW Generator Status
 - LQG >1000 kg/month (2200 lbs/month)
 - Acute HW > 1 kg/month
 - SQG 100-1000 kg/month(220-2200lbs/month)
 - Acute HW < 1 kg/month
 - VSQG <100 kg/month (<220 lbs/month)
- ✓ Designates level of regulatory requirements
- ✓ Ensures Proper HW Management

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Hazardous Waste Generator Requirements (40 CFR PART 261)

- ✓ Determine if your wastes are hazardous
 - ✓ Based on knowledge or analysis
- ✓ Determine what generator status: LQG, SQG, VSQG
- ✓ Register with EPA/MDE, obtain ID Number
- ✓ Accumulate and store waste properly
- ✓ Ship wastes for off-site disposal using a licensed transporter and permitted TSDF
- ✓ Have procedures for emergencies
- ✓ Keep records that demonstrate compliance
 - ✓ Waste analysis and/or logic for why non-hazardous

What is a Hazardous Waste? (40 C F R PART 261)

- ✓ A waste or combination of wastes which because of
- ✓ Quantity, concentration, or physical, chemical or infectious characteristics
- ✓ May cause serious, irreversible hazard to human health and the environment

Listed Wastes

 \mathcal{F}_{i} \mathcal{F}_{i}

Hazardous Waste

- ✓ <u>F List</u> Non Specific Sources (solvents, electroplating baths with cyanides)
- ✓ <u>K List</u> Specific Sources (wood preserving wastes)
- ✓ <u>U List</u> Discarded, Off-Spec Spill Residue (off-spec acetone)
- ✓ P List Acutely Hazardous, Discarded, Off-Spec Spill Residue (cyanides)

Characteristic Wastes



Ignitable (D001)

 $(FP < 140^{\circ} F)$



Corrosive (D002) ($pH \le 2 \text{ or } \ge 12.5$)



Reactive (D003)

(reacts w/ H₂O, gases)



Toxic (D004-D043) [Test for metals and organics using Toxicity Characteristic Leaching Procedure (TCLP)] CAPACCIO ENVIRONMENTAL ENGINEERING,INC..

Toxicity Characteristic Leaching Procedure (TCLP) Metals

- **✓** D004 Arsenic (5mg/l)
- √ D005 Barium
 (100mg/l)
- ✓ D006 Cadmium (1mg/l)
- ✓ D007Chromium (5mg/l)

- **✓** D008 Lead (5mg/l)
- ✓ D009 Mercury (0.2mg/l)
- ✓ D010 Selenium (1mg/l)
- **✓** D011 Silver (5mg/l)

Mixture Rule

- ✓ Mixture of a listed hazardous waste and non-listed hazardous waste generates a listed hazardous waste.
- ✓ Mixture of a characteristic waste and a nonlisted hazardous waste only generates a hazardous waste if the waste exhibits a characteristic.

When Is A Container Empty?

- ✓ Pump, pour, scrape everything possible out of the container
- ✓ Non-acutely HW = < 1 inch of residue
- ✓ Acutely HW = triple rinsing
- ✓ Gases = pressure inside container equals atmospheric pressure

Hazardous Wastes Treated in Pretreatment WWT Systems

- ✓ Count towards HW Generator Status
- ✓ Treatment exempt from licensing however, must comply with
- ✓ Memo between DEP and MWRA allows for treatment of non hard-piped hazardous wastes in on-site treatment under special conditions
- ✓ May be expanded to other POTW districts by 2000 CAPACCIO ENVIRONMENTAL ENGINEERING, IN

Metal Finishing

Electroplating

- ✓ Spent cyanide plating baths- F007
- ✓ Sludges /residues cyanide plating- F008
- ✓ Spent stripping/cleaning (cyanides) F009
- ✓ Spent cyanide salts (heat treating)-F011
- ✓ Acids/Alkalis- D002 (Corrosive/TCLP)
- ✓ Reactive Wastes (cyanides)- D003
- ✓ Process baths filters-Listed or Test TCLP
- ✓ Non-cyanide Electroplating Baths and Rinse waters not "F" listed Test Tolk P, pH:

Metal Finishing Anodizing

- ✓ Not "F" listed if no cyanides used
- ✓ Soak Cleans -D002 (Corrosive)
- ✓ Rinse Water
 - D002 (Corrosive)
 - TCLP Metals

Metal Finishing Chemical Conversion Coating

- ✓ Hexavalent Chromium Baths- D007
- ✓ Passivation with Nitric Acid-D002
- ✓ Rinse waters
 - D002 (Corrosive)
 - D007 (TCLP Hexavalent Chromium)

Metal Finishing Painting

- ✓ Solvent Paints F001,F003,F004,F005 (Toluene, MEK, MIBK)
- ✓ Aqueous Paints- In general, non-hazardous waste but can not go in dumpster
- ✓ Powder Coatings- D005 (TCLP Barium)
- ✓ Paint Filters- TCLP Metals
- ✓ Rags
- ✓ Petroleum Distillates-D001 (Ignitable)

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Silk Screening

- ✓ Solvents- F001, F003, F004, F005
- ✓ Screen Inks-D001 (Ignitable)

Wastewater Treatment Sludge (F006)

Wastewater treatment sludge from electroplating operations except:

- ✓ sulfuric acid anodizing of aluminum
- ✓ tin plating on carbon steel
- ✓ zinc plating (segregated) on carbon steel
- ✓ aluminum or zinc plating on carbon steel
- ✓ cleaning/stripping associated with tin,zinc,aluminum plating on carbon steel
- ✓ chemical etching and milling of aluminum



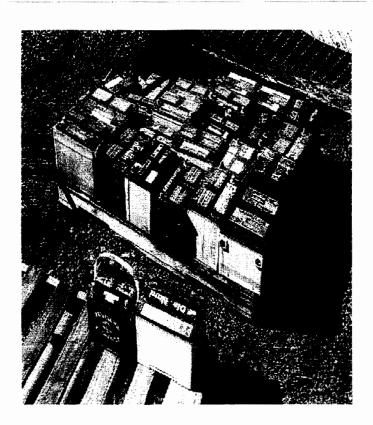
What's New?

Proposed Rule: 180- Day Accumulation Time for Sludges from the Metal Finishing Industry

EPA is proposing to allow generators of F006 waste extended accumulation time

- ✓ Allows 180 days of accumulation (270 if applicable) without a hazardous waste storage permit
- ✓ Designed to provide incentive to choose metal recovery vs. treatment & disposal by removing economic barriers.

Universal Wastes



- ✓ What are Universal Wastes?
 - Batteries
 - Pesticides
 - Thermostats
 - Mercury-containing devices and lamps

Summary

- ✓ As the generator you are responsible to know if your waste is hazardous!
- ✓ You can base this determination on knowledge of the process or analysis
- Review Lists (40 CFR part 261)
- Test for Characteristics (40 CFR part 261, SUBPRT
 - Use a certified laboratory
- ✓ Document your determination, keep on file

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Next Steps

- ✓ List your wastes and indicate if and why they are hazardous
- ✓ Check to make sure your generator status is correct, if not notify DEP with a "Change of Status" Form
- ✓ As Always, if possible implement P2 Plan!
- ✓ Implement a HW Management Plan appropriate to generator status

Step 5: Document and Keep Training Records

Name			
Joł	o Title		
Hi	re Date		
Jol	b Description		
	☐ Initial Training	□Annual Refresher	
	he above employee has received the follow propriate to the job description. Check all box	•	
	I understand that all hazardous waste conta adding or removing wastes.	iners are to be kept closed except when	
	I understand that the satellite accumulation waste) needs to be dated on the date that the		
	I understand that when satellite accumulatio transferred to the final accumulation area (s days.		
	I understand that containers holding hazardo "Hazardous Waste," "the Major Risk" and the		
-	I understand that Your Company Name is days to ship waste off-site.	a Large Quantity Generator and has 90	
	I understand that I am to conduct weekly inspections of the final accumulation area, and note any problems on the inspection log, and what actions I took to correct the problem.		
	I know where the emergency equipment is k	ept and how to use it.	
Supervisor/Trainer		Date	
Employee Name		Date	

Weekly Inspection Checklist

	Drums and containers have a hazardous waste and risk label.	
۵	Non-satellite accumulation containers are marked with the accumulation start date.	
ū	Drums and other hazardous waste containers are closed.	
ū	Labels are visible and readable.	
ū	Drum are in good shape: no leaks, dents, or rust.	
ū	30 inches of aisle space is maintained between rows of drums.	
	The secondary containment does not have any liquids in it.	
ū	Fire extinguishers are charged.	
a	Spills kits are stocked.	
ū	Emergency shower and eyewash are functioning properly.	
	Emergency phone numbers are posted near the phone.	
۵	Comments: Use this space to describe the actions you took to correct anything noted above and the date that the problem was corrected.	
En	nployee Name Date	

Steps 1&2: Identify positions that handle dangerous waste and write a job description for each position.

Job Title: _	
	Job Description:
Job Title: _	
	Job Description:
Iob Tidos	
Job Title: _	
Job 1	Description:
	
	
Job Title:	
Job 3	Description:
-	

Examples of Positions and Training Levels

Level One: Those employees with minimal contact to hazardous wastes.

Level Two: Those employees whom have extensive contact with hazardous wastes.

Painters Machinists

Plating line workers Silk-Screen Washers

Mechanics

Solvent Still Operators Evaporation Unit Operators

Level Three: Those employees who supervise level two workers or who would respond to a hazardous materials emergency.

Environmental Health and Safety Managers

Emergency Responders/Coordinators

Supervisors of areas that generate hazardous wastes

Develop and Deliver Training

Container Management

- Containers must be closed except when adding or removing waste
 - ✓ Locking type funnel is closed
 - ✓ Non-locking funnels are removed each time waste is added
 - ✓ Ring locks are securely fastened
- Rows of containers are separated by 30 inches of aisle space
- Containers are free of rusts, dents, and leaks.

Labeling:

- Containers must be labeled "Hazardous Waste" or "Dangerous Waste"
- The major risk is identified: Flammable, Corrosive, Toxic.

Satellite Accumulation:

- Our satellite accumulation areas are located For each satellite accumulation area, the designated operators are ...
- The operator(s) shall ensure the following:
 - ✓ There is no more than 55-gallons per waste stream in the satellite accumulation
 - ✓ The satellite accumulation containers are labeled "Hazardous Waste" or "Dangerous Waste" and the major risk (flammable, corrosive, toxic) is identified.
 - ✓ Once the satellite accumulation drum contains 55-gallons of waste, it is immediately dated with the accumulation start date, which for satellite accumulation container is the day that the container reached 55-gallons.
 - ✓ Once the satellite accumulation drum is full and dated, it will be removed within three days to the final accumulation area, which is located _____

Accumulation Start Dates

- All non-satellite containers will be labeled with the date waste first started accumulating in the container.
- Satellite containers will be dated when the container reaches 55-gallons.
- Our company has 90 days to ship the waste off-site.
- When the date on the container indicates that the waste has been on-site for 80 days, call ______.

Weekly Inspections

- Weekly inspections of the satellite and final accumulation areas shall be conducted by
- A "Weekly Inspection Log" can be found _______
- Problems and any actions taken to correct problems shall be noted on the log.
- Emergency equipment and spill kits will also be inspected to ensure that the necessary supplies are available.

Regulations (Standards - 29 CFR) Hazardous waste operations and emergency response. - 1910.120

Regulations (Standards - 29 CFR) - Table of Contents

• Part Number:

Part Title: Occupational Safety and Health Standards

1910

• Subpart:

• Subpart Title: Hazardous Materials

• Standard Number: 1910.120

• Title: Hazardous waste operations and emergency response.

• Appendix: \underline{A} , \underline{B} , \underline{C} , \underline{D} , \underline{E}

1910.120(a)

Scope, application, and definitions. --

1910.120(a)(1)

Scope. This section covers the following operations, unless the employer can demonstrate that the operation does not involve employee exposure or the reasonable possibility for employee exposure to safety or health hazards:

1910.120(a)(1)(i)

Clean-up operations required by a governmental body, whether Federal, state local or other involving hazardous substances that are conducted at uncontrolled hazardous waste sites (including, but not limited to, the EPA's National Priority Site List (NPL), state priority site lists, sites recommended for the EPA NPL, and initial investigations of government identified sites which are conducted before the presence or absence of hazardous substances has been ascertained);

1910.120(a)(1)(ii)

Corrective actions involving clean-up operations at sites covered by the Resource Conservation and Recovery Act of 1976 (RCRA) as amended (42 U.S.C. 6901 *et seq*);

1910.120(a)(1)(iii)

Voluntary clean-up operations at sites recognized by Federal, state, local or other governmental bodies as uncontrolled hazardous waste sites;

1910.120(a)(1)(iv)

Operations involving hazardous waste that are conducted at treatment, storage, disposal (TSD) facilities regulated by 40 CFR Parts 264 and 265 pursuant to RCRA; or by agencies under agreement with U.S.E.P.A. to implement RCRA regulations; and

1910.120(a)(1)(v)

Emergency response operations for releases of, or substantial threats of releases of, hazardous substances without regard to the location of the hazard.

Notes and Exceptions:

1910.120(a)(2)(iii)(A)

All provisions of paragraph (p) of this section cover any treatment, storage or disposal (TSD) operation regulated by 40 CFR parts 264 and 265 or by state law authorized under RCRA, and required to have a permit or interim status from EPA pursuant to 40 CFR 270.1 or from a state agency pursuant to RCRA.

1910.120(a)(2)(iii)(B)

Employers who are not required to have a permit or interim status because they are conditionally exempt small quantity generators under 40 CFR 261.5 or are generators who qualify under 40 CFR 262.34 for exemptions from regulation under 40 CFR parts 264, 265 and 270 ("excepted employers") are not covered by paragraphs (p)(1) through (p)(7) of this section. Excepted employers who are required by the EPA or state agency to have their employees engage in emergency response or who direct their employees to engage in emergency response are covered by paragraph (p)(8) of this section, and cannot be exempted by (p)(8)(i) of this section.

1910.120(a)(2)(iii)(C)

If an area is used primarily for treatment, storage or disposal, any emergency response operations in that area shall comply with paragraph (p) (8) of this section. In other areas not used primarily for treatment, storage, or disposal, any emergency response operations shall comply with paragraph (q) of this section. Compliance with the requirements of paragraph (q) of this section shall be deemed to be in compliance with the requirements of paragraph (p)(8) of this section.

1910.120(a)(2)(iv)

Emergency response operations for releases of, or substantial threats of releases of, hazardous substances which are not covered by paragraphs (a)(1)(i) through (a)(1)(iv) of this section must only comply with the requirements of paragraph (q) of this section.

Hazardous waste means ---

- [A] A waste or combination of wastes as defined in 40 CFR 261.3, or
- [B] Those substances defined as hazardous wastes in 49 CFR 171.8.

Hazardous waste operation means any operation conducted within the scope of this standard.

Hazardous waste site or **Site** means any facility or location within the scope of this standard at which hazardous waste operations take place.

Health hazard means a chemical, mixture of chemicals or a pathogen for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic health effects may occur in exposed employees. The term "health hazard" includes chemicals which are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, agents which act on the hematopoietic system, and agents which damage the lungs, skin, eyes, or mucous membranes. It also includes stress due to temperature extremes. Further definition of the terms used above can be found in Appendix A to 29 CFR 1910.1200.

Safety and health program.

NOTE TO (b): Safety and health programs developed and implemented to meet other federal, state, or local regulations are considered acceptable in meeting this requirement if they cover or are modified to cover the topics required in this paragraph. An additional or separate safety and health program is not required by this paragraph.

1910.120(b)(1)

General.

1910.120(b)(1)(i)

Employers shall develop and implement a written safety and health program for their employees involved in hazardous waste operations. The program shall be designed to identify, evaluate, and control safety and health hazards, and provide for emergency response for hazardous waste operations.

1910.120(b)(1)(ii)

The written safety and health program shall incorporate the following:

1910.120(b)(1)(ii)(A)

An organizational structure;

1910.120(b)(1)(ii)(B)

A comprehensive workplan;

1910.120(b)(1)(ii)(C)

A site-specific safety and health plan which need not repeat the employer's standard operating procedures required in paragraph (b)(1)(ii)(F) of this section;

1910.120(b)(1)(ii)(D)

The safety and health training program;

1910.120(b)(1)(ii)(E)

The medical surveillance program;

1910.120(b)(1)(ii)(F)

The employer's standard operating procedures for safety and health; and

1910.120(b)(1)(ii)(G)

Any necessary interface between general program and site specific activities.

1910.120(b)(1)(iii)

1910.120(b)(4)

Site-specific safety and health plan part of the program. --

1910.120(b)(4)(i)

General. The site safety and health plan, which must be kept on site, shall address the safety and health hazards of each phase of site operation and include the requirements and procedures for employee protection.

1910.120(b)(4)(ii)

Elements. The site safety and health plan, as a minimum, shall address the following:

1910.120(b)(4)(ii)(A)

A safety and health risk or hazard analysis for each site task and operation found in the workplan.

1910.120(b)(4)(ii)(B)

Employee training assignments to assure compliance with paragraph (e) of this section.

1910.120(b)(4)(ii)(C)

Personal protective equipment to be used by employees for each of the site tasks and operations being conducted as required by the personal protective equipment program in paragraph (g)(5) of this section.

1910.120(b)(4)(ii)(D)

Medical surveillance requirements in accordance with the program in paragraph (f) of this section.

1910.120(b)(4)(ii)(E)

Frequency and types of air monitoring, personnel monitoring, and environmental sampling techniques and instrumentation to be used, including methods of maintenance and calibration of monitoring and sampling equipment to be used.

1910.120(b)(4)(ii)(F)

Site control measures in accordance with the site control program required in paragraph (d) of this section.

1910.120(b)(4)(ii)(G)

Decontamination procedures in accordance with paragraph (k) of this section.

1910.120(b)(4)(ii)(H)

An emergency response plan meeting the requirements of paragraph (I) of this section for safe and effective responses to emergencies, including the necessary PPE and other equipment.

Site characterization and analysis --

1910.120(c)(1)

General. Hazardous waste sites shall be evaluated in accordance with this paragraph to identify specific site hazards and to determine the appropriate safety and health control procedures needed to protect employees from the identified hazards.

1910.120(c)(2)

Preliminary evaluation. A preliminary evaluation of a site's characteristics shall be performed prior to site entry by a qualified person in order to aid in the selection of appropriate employee protection methods prior to site entry. Immediately after initial site entry, a more detailed evaluation of the site's specific characteristics shall be performed by a qualified person in order to further identify existing site hazards and to further aid in the selection of the appropriate engineering controls and personal protective equipment for the tasks to be performed.

1910.120(c)(3)

Hazard identification. All suspected conditions that may pose inhalation or skin absorption hazards that are immediately dangerous to life or health (IDLH) or other conditions that may cause death or serious harm shall be identified during the preliminary survey and evaluated during the detailed survey. Examples of such hazards include, but are not limited to, confined space entry, potentially explosive or flammable situations, visible vapor clouds, or areas where biological indicators such as dead animals or vegetation are located.

1910.120(e)

Training. --

1910.120(e)(1)

General.

1910.120(e)(1)(i)

All employees working on site (such as but not limited to equipment operators, general laborers and others) exposed to hazardous substances, health hazards, or safety hazards and their supervisors and management responsible for the site shall receive training meeting the requirements of this paragraph before they are permitted to engage in hazardous waste operations that could expose them to hazardous substances, safety, or health hazards, and they shall receive review training as specified in this paragraph.

1910.120(e)(1)(ii)

Employees shall not be permitted to participate in or supervise field activities until they have been trained to a level required by their job function and responsibility.

1910.120(e)(2)

Elements to be covered. The training shall thoroughly cover the following:

1910.120(e)(2)(i)

Names of personnel and alternates responsible for site safety and health;

1910.120(e)(2)(ii)

Safety, health and other hazards present on the site;

1910.120(e)(2)(iii)

Use of personal protective equipment;

1910.120(e)(2)(iv)

Work practices by which the employee can minimize risks from hazards;

1910.120(e)(2)(v)

Safe use of engineering controls and equipment on the site;

1910.120(e)(2)(vi)

Medical surveillance requirements including recognition of symptoms and signs which might indicate over exposure to hazards; and

1910.120(e)(2)(vii)

The contents of paragraphs (G) through (J) of the site safety and health plan set forth in paragraph (b)(4)(ii) of this section.

1910.120(e)(3)

Initial training.

1910.120(e)(3)(i)

General site workers (such as equipment operators, general laborers and supervisory personnel) engaged in hazardous substance removal or other activities which expose or potentially expose workers to hazardous substances and health hazards shall receive a minimum of 40 hours of instruction off the site, and a minimum of three days actual field experience under the direct supervision of a trained experienced supervisor.

1910.120(e)(3)(ii)

Workers on site only occasionally for a specific limited task (such as, but not limited to, ground water monitoring, land surveying, or geophysical surveying) and who are unlikely to be exposed over permissible exposure limits and published exposure limits shall receive a minimum of 24 hours of instruction off the site, and the minimum of one day actual field experience under the direct supervision of a trained, experienced supervisor.

1910.120(e)(3)(iii)

Workers regularly on site who work in areas which have been monitored and fully characterized indicating that exposures are under permissible exposure limits and published exposure limits where respirators are not necessary, and the characterization indicates that there are no health hazards or the possibility of an emergency developing, shall receive a minimum of 24 hours of instruction off the site, and the minimum of one day actual field experience under the direct supervision of a trained, experienced supervisor.

1910.120(e)(3)(iv)

Workers with 24 hours of training who are covered by paragraphs (e)(3)(ii) and (e)(3)(iii) of this section, and who become general site workers or who are required to wear respirators, shall have the additional 16 hours and two days of training necessary to total the training specified in paragraph (e)(3)(i).

1910.120(e)(4)

Management and supervisor training. On-site management and supervisors directly responsible for, or who supervise employees engaged in, hazardous waste operations shall receive 40 hours initial training, and three days of supervised field experience (the training may be reduced to 24 hours and one day if the only area of their responsibility is employees covered by paragraphs (e)(3)(ii) and (e)(3)(iii)) and at least eight additional hours of specialized training at the time of job assignment on such topics as, but not limited to, the employer's safety and health program and the associated employee training program, personal protective equipment program, spill containment program, and health hazard monitoring procedure and techniques.

1910.120(e)(5)

Qualifications for trainers. Trainers shall be qualified to instruct employees about the subject matter that is being presented in training. Such trainers shall have satisfactorily completed a training program for teaching the subjects they are expected to teach, or they shall have the academic credentials and instructional experience necessary for teaching the subjects. Instructors shall demonstrate competent instructional skills and knowledge of the applicable subject matter.

1910.120(e)(6)

Training certification. Employees and supervisors that have received and successfully completed the training and field experience specified in paragraphs (e)(1) through (e)(4) of this section shall be certified by their instructor or the head instructor and trained supervisor as having completed the necessary training. A written certificate shall be given to each person so certified. Any person who has not been so certified or who does not meet the requirements of paragraph (e)(9) of this section shall be prohibited from engaging in hazardous waste operations.

1910.120(e)(9)

Equivalent training. Employers who can show by documentation or certification that an employee's work experience and/or training has resulted in training equivalent to that training required in paragraphs (e)(1) through (e)(4) of this section shall not be required to provide the initial training requirements of those paragraphs to such employees and shall provide a copy of the certification or documentation to the employee upon request. However, certified employees or employees with equivalent training new to a site shall receive appropriate, site specific training before site entry and have appropriate supervised field experience at the new site. Equivalent training includes any academic training or the training that existing employees might have already received from actual hazardous waste site experience.

1910.120(g)(3)

Personal protective equipment selection.

1910.120(g)(3)(i)

Personal protective equipment (PPE) shall be selected and used which will protect employees from the hazards and potential hazards they are likely to encounter as identified during the site characterization and analysis.

1910.120(g)(3)(ii)

Personal protective equipment selection shall be based on an evaluation of the performance characteristics of the PPE relative to the requirements and limitations of the site, the task-specific conditions and duration, and the hazards and potential hazards identified at the site.

1910.120(g)(3)(iii)

Positive pressure self-contained breathing apparatus, or positive pressure air-line respirators equipped with an escape air supply shall be used when chemical exposure levels present will create a substantial possibility of immediate death, immediate serious illness or injury, or impair the ability to escape.

. 1910.120(g)(5)

Personal protective equipment (PPE) program. A personal protective equipment program, which is part of the employer's safety and health program required in paragraph (b) of this section or required in paragraph (p)(1) of this section and which isalso a part of the site-specific safety and health plan shall be established. The PPE program shall address the elements listed below. When elements, such as donning and doffing procedures, are provided by the manufacturer of a piece of equipment and are attached to the plan, they need not be rewritten into the plan as long as they adequately address the procedure or element.

1910.120(g)(5)(i)

PPE selection based upon site hazards.

1910.120(g)(5)(ii)

PPE use and limitations of the equipment,

1910.120(g)(5)(iii)

Work mission duration,

1910.120(g)(5)(iv)

PPE maintenance and storage,

1910.120(g)(5)(v)

PPE decontamination and disposal,

1910.120(g)(5)(vi)

PPE training and proper fitting,

1910.120(g)(5)(vii)

PPE donning and doffing procedures,

1910.120(g)(5)(viii)

PPE inspection procedures prior to, during, and after use,

1910.120(g)(5)(ix)

Evaluation of the effectiveness of the PPE program, and

1910.120(g)(5)(x)

Limitations during temperature extremes, heat stress, and other appropriate medical considerations.

1910.120(h)(3)

Periodic monitoring. Periodic monitoring shall be conducted when the possibility of an IDLH condition or flammable atmosphere has developed or when there is indication that exposures may have risen over permissible exposure limits or published exposure levels since prior monitoring. Situations where it shall be considered whether the possibility that exposures have risen are as follows:

1910.120(j)

Handling drums and containers --

1910.120(j)(1)

General.

1910.120(j)(1)(i)

Hazardous substances and contaminated, liquids and other residues shall be handled, transported, labeled, and disposed of in accordance with this paragraph.

1910.120(j)(1)(ii)

Drums and containers used during the clean-up shall meet the appropriate DOT, OSHA, and EPA regulations for the wastes that they contain.

1910.120(j)(1)(iii)

When practical, drums and containers shall be inspected and their integrity shall be assured prior to being moved. Drums or containers that cannot be inspected before being moved because of storage conditions (i.e., buried beneath the earth, stacked behind other drums, stacked several tiers high in a pile, etc.) shall be moved to an accessible location and inspected prior to further handling.

1910.120(j)(1)(iv)

Unlabeled drums and containers shall be considered to contain hazardous substances and handled accordingly until the contents are positively identified and labeled.

1910.120(j)(1)(v)

Site operations shall be organized to minimize the amount of drum or container movement.

1910.120(j)(1)(vi)

Prior to movement of drums or containers, all employees exposed to the transfer operation shall be warned of the potential hazards associated with the contents of the drums or containers.

1910.120(j)(7)

Sampling of drum and container contents. Sampling of containers and drums shall be done in accordance with a sampling procedure which is part of the site safety and health plan developed for and available to employees and others at the specific worksite.

1910.120(j)(8)

Shipping and transport.

* 1910.120(j)(8)(i)

Drums and containers shall be identified and classified prior to packaging for shipment.

1910.120(j)(8)(ii)

Drum or container staging areas shall be kept to the minimum number necessary to safely identify and classify materials and prepare them for transport.

1910.120(j)(8)(iii)

Staging areas shall be provided with adequate access and egress routes.

1910.120(j)(8)(iv)

Bulking of hazardous wastes shall be permitted only after a thorough characterization of the materials has been completed.

1910.120(j)(9)

1910.120(p)

Certain Operations Conducted Under the Resource Conservation and Recovery Act of 1976 (RCRA). Employers conducting operations at treatment, storage and disposal (TSD) facilities specified in paragraph (a)(1)(iv) of this section shall provide and implement the programs specified in this paragraph. See the "Notes and Exceptions" to paragraph (a)(2)(iii) of this section for employers not covered.

1910.120(p)(1)

Safety and health program. The employer shall develop and implement a written safety and health program for employees involved in hazardous waste operations that shall be available for inspection by employees, their representatives and OSHA personnel. The program shall be designed to identify, evaluate and control safety and health hazards in their facilities for the purpose of employee protection, to provide for emergency response meeting the requirements of paragraph (p)(8) of this section and to address as appropriate site analysis, engineering controls, maximum exposure limits, hazardous waste handling procedures and uses of new technologies.

1910.120(p)(2)

Hazard communication program. The employer shall implement a hazard communication program meeting the requirements of 29 CFR 1910.1200 as part of the employer's safety and program.

NOTE TO §1910.120 - The exemption for hazardous waste provided in 1910.1200 is applicable to this section.

1910.120(p)(3)

Medical surveillance program. The employer shall develop and implement a medical surveillance program meeting the requirements of paragraph (f) of this section.

1910.120(p)(4)

Decontamination program. The employer shall develop and implement a decontamination procedure meeting the requirements of paragraph (k) of this section.

1910.120(p)(5)

New technology program. The employer shall develop and implement procedures meeting the requirements of paragraph (o) of this section for introducing new and innovative equipment into the workplace.

1910.120(p)(6)

Material handling program. Where employees will be handling drums or containers, the employer shall develop and implement procedures meeting the requirements of paragraphs (j)(1)(ii) through (viii) and (xi) of this section, as well as (j)(3) and (j)(8) of this section prior to starting such work.

1910.120(p)(7)

Training program --

1910.120(p)(7)(i)

New employees. The employer shall develop and implement a training program which is part of the employer's safety and health program, for employees exposed to health hazards or hazardous substances at TSD operations to enable the employees to perform their assigned duties and functions in a safe and healthful manner so as not to endanger themselves or other employees. The initial training shall be for 24 hours and refresher training shall be for eight hours annually. Employees who have received the initial training required by this paragraph shall be given a written certificate attesting that they have successfully completed the necessary training.

1910.120(p)(7)(ii)

Current employees. Employers who can show by an employee's previous work experience and/or training that the employee has had training equivalent to the initial training required by this paragraph, shall be considered as meeting the initial training requirements of this paragraph as to that employee. Equivalent training includes the training that existing employees might have already received from actual site work experience. Current employees shall receive eight hours of refresher training annually.

1910.120(p)(7)(iii)

Trainers. Trainers who teach initial training shall have satisfactorily completed a training course for teaching the subjects they are expected to teach or they shall have the academic credentials and instruction experience necessary to demonstrate a good command of the subject matter of the courses and competent instructional skills.

1910.120(p)(8)

Emergency response program --

. 1910.120(p)(8)(i)

Emergency response plan. An emergency response plan shall be developed and implemented by all employers. Such plans need not duplicate any of the subjects fully addressed in the employer's contingency planning required by permits, such as those issued by the U.S. Environmental Protection Agency, provided that the contingency plan is made part of the emergency response plan. The emergency response plan shall be a

written portion of the employer's safety and health program required in paragraph (p)(1) of this section. Employers who will evacuate their employees from the worksite location when an emergency occurs and who do not permit any of their employees to assist in handling the emergency are exempt from the requirements of paragraph (p)(8) if they provide an emergency action plan complying with 29 CFR 1910.38.

1910.120(p)(8)(ii)

Elements of an emergency response plan. The employer shall develop an emergency response plan for emergencies which shall address, as a minimum, the following areas to the extent that they are not addressed in any specific program required in this paragraph:

Training.

. 1910.120(p)(8)(iii)(A)

Training for emergency response employees shall be completed before they are called upon to perform in real emergencies. Such training shall include the elements of the emergency response plan, standard operating procedures the employer has established for the job, the personal protective equipment to be worn and procedures for handling emergency incidents.

Exception #1: an employer need not train all employees to the degree specified if the employer divides the work force in a manner such that a sufficient number of employees who have responsibility to control emergencies have the training specified, and all other employees, who may first respond to an emergency incident, have sufficient awareness training to recognize that an emergency response situation exists and that they are instructed in that case to summon the fully trained employees and not attempt control activities for which they are not trained.

Exception #2: An employer need not train all employees to the degree specified if arrangements have been made in advance for an outside fully-trained emergency response team to respond in a reasonable period and all employees, who may come to the incident first, have sufficient awareness training to recognize that an emergency response situation exists and they have been instructed to call the designated outside fully-trained emergency response team for assistance.

1910.120(q)(2)

Elements of an emergency response plan. The employer shall develop an emergency response plan for emergencies which shall address, as a minimum, the following areas to the extent that they are not addressed in any specific program required in this paragraph:

1910.120(q)(2)(i)

Pre-emergency planning and coordination with outside parties..

1910.120(q)(2)(ii)

Personnel roles, lines of authority, training, and communication.

1910.120(q)(2)(iii)

Emergency recognition and prevention.

1910.120(q)(2)(iv)

Safe distances and places of refuge.

1910.120(q)(2)(v)

Site security and control.

1910.120(q)(2)(vi)

Evacuation routes and procedures.

1910.120(q)(2)(vii)

Decontamination.

1910.120(q)(2)(viii)

Emergency medical treatment and first aid.

1910.120(q)(2)(ix)

Emergency alerting and response procedures.

1910.120(q)(2)(x)

Critique of response and follow-up.

1910.120(q)(2)(xi)

PPE and emergency equipment.

1910.120(q)(2)(xii)

Emergency response organizations may use the local emergency response plan or the state emergency response plan or both, as part of their emergency response plan to avoid duplication. Those items of the emergency response plan that are being properly addressed by the SARA Title III plans may be substituted into their emergency plan or otherwise kept together for the employer and employee's use.

261.23 Characteristic of reactivity.

(a) A solid waste exhibits the characteristic of reactivity if a representative sample of the waste has any

of the following properties:

(1) It is normally un

- (2) It reacts violently with water.
- (3) It forms potentially explosive mixtures with water.
- (4) When mixed with water, it generates toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment.
- (5) It is a cyanide or sulfide bearing waste which, when exposed to pH conditions between 2 and 12.5, can generate toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health
- (6) It is capable of detonation or explosive reaction if it is subjected to a strong initiating source or if heated under confinement.
- (7) It is readily capable of detonation or explosive decomposition or reaction at standard temperature and pressure.
- (8) It is a forbidden explosive as defined in 49 CFR 173.51, or a Class A explosive as defined in 49 CFR 173.53 or a Class B explosive as defined in 49 CFR 173.88.
- (b) A solid waste that exhibits the characteristic of reactivity has the EPA Hazardous Waste Number of D003.

[45 FR 33119, May 19, 1980, as amended at 55 FR 22684, June 1, 1990]

§ 261.24 Toxicity characteristic.

 Reactivity – Reactive wastes are unstable under "normal" conditions. They can cause explosions, toxic fumes, gases, or vapors when heated, compressed, or mixed with water. Examples include lithium-sulfur batteries and explosives. For more details, see 40 CFR §261.23. There are currently no test methods available.

40 HOUR HAZARDOUS WASTE OPERATIONS TRAINING AND 8 HOUR REFRESHER COURSE SYLLABUS

The course is updated to include the latest requirements of 29 CFR 1910.120 (Appendix E)

Course presentation includes lectures, demonstrations and hands-on training. The Course is heavily oriented to hands on training and provides a concentrated and updated manual. The course includes instruction on:

Program Objectives and Course Curriculum:

- 1. This course is to fulfill the Off-site training for hazardous waste operations, required by 29 CFR 1910.120 (e).
- 2. The persons completing this course successfully will become familiar with the topics below and have a beginning competence in hands-on implementation of routine hazardous waste site procedures:
- a. Regulations in 29 CFR 1910.120. (Section 1)
- b. Core elements of an occupational safety and health program. (Section 1)
- c. Content of a medical surveillance program as outlined in 29 CFR 1910.120(f). (Section 1)
- d. The content of an effective site safety and health plan consistent with the requirements of 29 CFR 1910.120(b) (4) (ii). (Section 1)
- e. Emergency response plan and procedures as outlined in 29 CFR 1910.38 and 29 CFR 1910.120(I). (Section 1)
- f. Adequate illumination. (Section 1)
- g. Sanitation recommendation and equipment. (Section 1)
- h. Review and explanation of OSHA's hazard-communication standard (29 CFR 1910.1200) and lock-out/tag-out standard (29 CFR 1910.147). (Section 1)
- Review of other applicable standards including but not limited to those in the construction standards (29 CFR Part 1926). (Section 1)
- j. Rights and responsibilities of employers and employees under applicable OSHA and EPA laws. (Section 1)
- k. Technical knowledge.
- I. Type of potential exposures to chemical, biological, and radiological hazards; types of human responses to these hazards and recognition of

those responses; principles of toxicology and information about acute and chronic hazards; health and safety considerations of new technology. (Section 2)

- m. Fundamentals of chemical hazards including but not limited to vapor pressure, boiling points, flash points, ph, other physical and chemical properties. (Section 2)
- n. Fire and explosion hazards of chemicals. (Section 2)
- o. General safety hazards such as but not limited to electrical hazards, powered equipment hazards, motor vehicle hazards, walking- working surface hazards, excavation hazards, and hazards associated with working in hot and cold temperature extremes. (Section 2)
- p. Review and knowledge of confined space entry procedures in 29 CFR 1910.146. (Section 2)
- q. Work practices to minimize employee risk from site hazards. (Section 5)
- r. Safe use of engineering controls, equipment, and any new relevant safety technology or safety procedures. (Section 5)
- s. Review and demonstration of competency with air sampling and monitoring equipment that may be used in a site monitoring program. (Section 4)
- t. Container sampling procedures and safeguarding; general drum and container handling procedures including special requirement for laboratory waste packs, shock-sensitive wastes, and radioactive wastes. (Section 5)
- u. The elements of a spill control program. (Section 1)
- v. Proper use and limitations of material handling equipment. (Section 5)
- w. Procedures for safe and healthful preparation of containers for shipping and transport. (Section 5)
- x. Methods of communication including those used while wearing respiratory protection. (Section 3)
- y. Technical skills.
- 1) Selection, use maintenance, and limitations of personal protective equipment including the components and procedures for carrying out a respirator program to comply with 29 CFR 1910.134. (Section 3)
- 2) Instruction in decontamination programs including personnel, equipment, and hardware; hands-on training including level A, B, and C ensembles and appropriate decontamination lines; field activities including the donning and doffing of protective equipment to a level commensurate with the employee's anticipated job function and responsibility and to the degree required by potential hazards. (Sec 3)
- 3) Sources for additional hazard information; exercises using relevant manuals and hazard coding systems. (Section 2)

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The course is organized in Six Sections:

Section 1 Regulations

Section 1-1 Regulatory History.

Section 1-2 List of Regulations Referenced in 1910.120:

Section 1-3 Training Required by 1910.120

Section 1-4 Core Elements of the Safety and Health Plan

Section 1-5 Emergency Response Plans

Section 1-6 Supporting Written Plans or Programs

Section 1-7 Illumination

Section 1-8 Sanitation.

Section 1-9 Hazard-Communication Standard

Section 1-10 Lock-Out/Tag-Out

Section 1-11 Other Regulations

Section 1-12 Rights and Responsibilities

Section 1-13 Interface of 1910.120 With Other Regulations.

Section 2 Hazard Recognition

Section 2-1 The Potential Hazards

Section 2-2 Chemical Hazards

Section 2-3 Biological Hazards

Section 2-4 Radiation Hazards

Section 2-5 New Technology

Section 2-6 Fire and Explosion Hazards

Section 2-7 Other Safety Hazards

Section 2-8 Excavation Hazards

Section 2-9 Confined Spaces

Section 2-10 Sources for Additional Hazard Information

Section 3 Personal Protective Equipment

Section 3-1 Respiratory Protection

Section 3-2 Levels of Protection and Protective Clothing

Section 3-3 Decontamination:

Section 3-4 Personal Protective Equipment Requirements

Section 3-5 Methods of Communication

Section 3-6 Personal Protective Equipment for Fire Fighting Operations

Section 4 Site Characterization and Monitoring

Section 4-1 OSHA Requirements

Section 4-2 Field Testing Methods

Section 5 Work Practices

Section 5-1 Site Control

Section 5-2 Safe use of Engineering Controls and Equipment

Section 5-3 Containers and Material Handling

Section 5-4 Remediation Operations

Section 6 Definitions / Acronyms

HAZWOPPER REFRESHER CURRICULUM

- Review of and retraining on relevant topics covered in the 40-hour program, as appropriate, using reports by the students on their work experiences
- 2. Update on developments with respect to material covered in the 40-hour course
- Review of changes to pertinent provisions of EPA or OSHA standards or laws
- 4. Introduction of additional subject areas as appropriate
- 5. Hands-on review of new or altered PPE or decontamination equipment or procedures and review of new developments in personal protective equipment
- 6. Review of newly developed air and contaminant monitoring equipment

EASTERN PLATING HAZARDOUS WASTE OPERATIONS Training Course Outline

29 CRF 1910.120

- 1.0 General Hazardous Waste Operations
- 2.0 RCRA Operations
 - 1. Storage
 - 2. Disposal
 - 3. Accumulation
- 3.0 Emergency Response
- 4.0 Video
- 5.0 Training Levels
- 6.0 Generator Requirements
- 7.0 Types of Hazardous Waste
 - 1. Listed
 - 2. Characteristic
 - 3. Universal
- 8.0 Summary

Step 5: Document and Keep Training Records

Na	Name			
Jo	b Title			
Hi	re Date			
Jo	b Description			
	□ Initial Training	□Annual Refresher		
	ne above employee has received the follopropriate to the job description. Check all be	owing hazardous waste training, which is exes that apply.		
a	I understand that all hazardous waste coradding or removing wastes.	ntainers are to be kept closed except when		
	I understand that the satellite accumulatio waste) needs to be dated on the date that the	n drum of (insert the name of your satellite ne container became full.		
a		ion drum exceeds 55-gallons, it needs to be (specific location at your facility) within 3		
۵	I understand that containers holding hazardous waste must be labeled with the words "Hazardous Waste," "the Major Risk" and the accumulation start date.			
0	I understand that Your Company Name is a Large Quantity Generator and has 90 days to ship waste off-site.			
u	I understand that I am to conduct weekly inspections of the final accumulation area, and note any problems on the inspection log, and what actions I took to correct the problem.			
a	I know where the emergency equipment is	kept and how to use it.		
Su	pervisor/Trainer	Date		
En	nployee Name	Date		

How To Develop a Written Personnel Training Plan WAC 173-303-330

Step 1: Identify positions that handle dangerous waste. Include those positions that:

Add or remove waste from containers

Operate a recycling still, evaporator or wastewater treatment unit

Transfer waste from one area or container to another

Inspect dangerous waste accumulation areas

Label containers

Prepare waste for transport

Step 2: For each position identified, write a job description that includes the dangerous waste activities that are performed in that position.

Step 3: Identify the relevant training needs for each position

Level One Level Two Level Three

Step 4: Train employees to do their job in compliance with the *Dangerous Waste* regulations.

Step 5: Document and keep training records.

Step 3. Identify Training Levels

Level One:

Positions whose jobs only require adding or removing waste to container or tanks.

Level Two:

Positions whose jobs require the transferring of wastes from satellite accumulation areas to final accumulation areas.

Positions whose jobs require access to a satellite accumulation area.

Positions whose jobs require operating a solvent still, an evaporator or wastewater treatment unit.

Positions whose jobs require filling out manifests.

Level Three:

Positions whose jobs require inspecting accumulation areas and or emergency response equipment.

Positions whose jobs require clean-up and response to spills and emergencies.

Positions whose jobs require training new employees.

Sample Training Plans for Each Level

Le	evel One:			
	Employees must understand that all hazardous waste containers are to be kept closed except when adding or removing wastes.			
Employees must be familiar with emergency equipment and emergency pro				
Le	evel Two:			
	Everything in Level One.			
	Employees must understand that the satellite accumulation drum of (insert the name of your satellite waste) needs to be dated on the date that the container became full.			
ū	Employees must understand that when satellite accumulation drum exceeds 55-gallons, it needs to be dated, and transferred to the final accumulation area (specific location at your facility) within 3 days.			
	Employees must understand that containers holding hazardous waste must be labeled with the words, "Hazardous Waste," "the Major Risk" and the accumulation stardate.			
۵	Employees must understand that Your Company Name is a Large Quantity Generator and has 90 days to ship waste off-site.			
	Employee must understand that the amounts of solvent recycled and waste evaporated must be kept in a log, and that all other container management requirements are applicable.			
L	Level Three:			
	Everything in Level One and Two.			
	Employees must understand that weekly inspections of final and satellite accumulation area must be done and any problems must be noted on the inspection log, including the actions taken to correct the problem.			
0	Employees must understand that emergency equipment must be inspected weekly.			

☐ Employees must know where the emergency equipment is kept and how to use it.

EASTERN PLATING HAZARDOUS WASTE OPERATIONS DAY 2

Training Course Outline 29 CRF 1910.120

- 1.0 SPCC Plan
- 2.0 Video RCRA Operations
 - 1. Incident Response
 - 2. RCRA Spill Plan
 - 3. Haz-Mat Emergency
- 3.0 Health and Safety Plan
- 4.0 Video
- 5.0 Hazardous Waste Operations and Emergency Response Training
- 6.0 Summary

EASTERN PLATING HAZARDOUS WASTE OPERATIONS DAY 2

Training Course Outline

29 CRF 1910.120

- 1.0 SPCC Plan
- 2.0 Video RCRA Operations
 - 1. Incident Response
 - 2. RCRA Spill Plan
 - 3. Haz-Mat Emergency
- 3.0 Health and Safety Plan
- 4.0 Video
- 5.0 Hazardous Waste Operations and Emergency Response Training
- 6.0 Summary

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

EASTERN PLATING, COMPANY, INC.

Facility Location:	1200 South Baylis Street
	Baltimore Maryland 21224

DATE of ISSUE: January 4, 2008

DATE of REVISION: n/a

PREPARED BY: Andy A. Amasia

Amasia Enterprises Inc.

COMPANY REVIEW BY:	NAME
	TITLE
	DATE

SPILL CONTROL AND COUNTERMEASURE PLAN

A. Name of facility

Eastern Plating Company, Inc.

B. Type of Facility

Aluminum Anodizing, Hardcoating, color anodizing and Iridite plating

C. Date of Initial Operation

This facility has served as a plating company since June 1972. The tanks range in age from 10 years to one year.

D. Location of Facility

1200 South Baylis Street Baltimore, Maryland 21224

Product lost during an above ground spill incident would enter the facility waste treatment system via containment sumps positioned under the tanks for storage and treatment, where the material is treated to meet permit limitation prior to discharge.

E. Facility Owner and Operator

Eastern Plating Company, Inc.

F. Designated person accountable for spill prevention at the facility

Wellington Abhilshi---Plant Chemist Michael Shimer---Lead Maintenance Man George Martinez---Chemical Handler

G. Spill History

This facility has not experienced a significant spill in the plant history

H. Management Approval

Full authority is extended to management to commit the necessary resources to remediate a spill incident.

SIGNATURE:		
NAME	TITLE:	

I. <u>CERTIFICATION</u>

I hereby certify that this facility has been inspected by Amasia Enterprises Inc. I, being familiar with the provisions of 40CFR, Part 112, attest that this SPCC Plan has been prepared in accordance with good engineering Practices.

SIGNAT	URE:
TITLE:_	
DATE:	

A complete Copy of this plan is maintained at this facility for on-site review by the Regional Administrator, Region III, EPA and the Maryland Department of the Environment as well as at the office of Amasia Enterprises, Inc.

SPILL CONTROL AND COUNTERMEASURE PLAN

A. Name of facility

Eastern Plating Company, Inc.

B. Type of Facility

Aluminum Anodizing, Hardcoating and color anodizing.

C. Date of Initial Operation

This facility has served as a plating company since April 2001. The tanks range in age from seven years to one year.

D. Location of Facility

7803 Pulaski Highway Baltimore, Maryland 21237

Product lost during an above ground spill incident would enter the facility waste treatment system, in accordance with our permit, via sump pumps positioned in the tank containment area.

E. Facility Owner and Operator

Eastern Plating Company, Inc.

F. Designated person accountable for spill prevention at the facility

Karen Keffer – Plant Manager Justin Wright - Production Coordinator

G. Spill History

This facility has not experienced a spill in the plant history

H. Management Approval

remediate a spill incident.	commit the necessary resources to
SIGNATURE:	
NAME	TITLE:

I. <u>CERTIFICATION</u>

I hereby certify that this facility has been inspected by Amasia Enterprises Inc. I, being familiar with the provisions of 40CFR, Part 112, attest that this SPCC Plan has been prepared in accordance with good engineering Practices.

SIGNATURE:_		
TITLE:		
DATE:		

A complete Copy of this plan is maintained at this facility for on-site review by the Regional Administrator, Region III, EPA and the Maryland Department of the Environment as well as at the office of Amasia Enterprises, Inc.

TANK LIST AND DRUM STORAGE

Tanks:

Tanks listed in DOCUMENT # QAR-4600 B - Appendix I

QAN-4600P

Drums:

Hazardous Waste Storage Area --- Nearest Baylis Street--- Maximum 8 drums
Containment Area

New Product, Chemicals Drums--Treatment room, main area---Maximum 25 Various Sizes

Pulaski

POTENTIAL SPILLS - PREVENTION AND CONTROL

Type of Failure: Overflow of Tanks

Quantity: 10 gallons or less

Flow Direction: Tanks are inside containment areas, flow will be contained.

Containment : All tanks are located inside the main building, the entire tank area drains to

sumps which are pumped to a tank in the treatment room for treatment prior

to discharge. Any spills or overflows are collected in these sumps.

SMALL SPILLS

Sorbent materials are kept in two mobile clean-up drums located within the facility. Each equipped with the absorbent materials and tools necessary to respond to small spills.

The location of these drums is contained in APPENDIX II within the EMERGENCY PREPAREDNESS, PREVENTION AND RESPONSE: EMERGENCY ACTION & CONTINGENCY PLAN

TANK LIST AND DRUM STORAGE

Tanks:

<u>Baylis</u>: Tanks Listed in document QAR-4600B Pulaski: Tanks Listed in document QAR-4600P

Drums:

Baylis:

Hazardous Waste Storage Area Shipping and Receiving Pallet Rack

Containment Area – Maximum 8 Drums

New Product, Chemical Drums Chemical Room, Main Area – Maximum 25 Drums

Various Sizes

Pulaski:

Hazardous Waste Storage Area Back of Building - Northeast Corner -

Containment Area – Maximum 4 drums

New Product, Chemical Drums Chemical Storage Area – Next to P1 Platform

Maximum 25 Drums Various Sizes

POTENTIAL SPILLS – PREVENTION AND CONTROL

Type of Failure: Overflow of Tanks Quantity: 10 gallons or less

Flow Direction: Tanks are inside containment area, flows will be contained.

Baylis Containment:

All tanks are located inside the main building, the entire tank drains to sumps which are pumped to a tank in the treatment room for treatment prior to discharge. Any spills or overflows are collected in these sumps.

Pulaski Containment:

All tanks are located inside the main building. Floor pumps located in the containment area are used to pump the spill to the collection tanks.

SMALL SPILLS

Sorbent materials are kept in two mobile clean-up drums located within the facilities. Each is equipped with the absorbent materials and tools necessary to respond to small spills.

The location of these drums in contained in APPENDIX II within the EMERGENCY PREAREDNESS, PREVENTION AND RESPONSE: EMERGENCY ACTION & CONTINGENCY PLAN.

LARGE SPILLS

Large spills are unlikely if not impossible since the largest tanks only contains about 600 gallons and the sumps and treatment tanks can hold many time that amount. Outside spill -control contractors would be contacted in the event of spills too large to handle with sorbents.

FACILITY DRAINAGE

All tanks are indoors as stated above. The tanks and drums are contained, all sumps are pumped to the treatment tanks for testing prior to discharge.

INSPECTION AND RECORDS

Routine drum and tank inspection are done weekly. Additions and deletions to and from stock are closely monitored. All records of inspections and other pertinent data will be retained for a period of not less than three years.

SECURITY

In accordance with regulations pertaining to storage facilities, the tank facility is secure, inside the main building which remains locked when not in operation.

PERSONNEL TRAINING AND SPILL PREVENTION PROCEDURES

All facility personnel have been instructed and trained in the following spill prevention and countermeasure plan:

- 1. Instructions have been held on spill prevention, containment and retrieval methods.
- 2. Instructions are clearly posted outlining the procedures to follow in the event of a spill.
- 3. Each Employee is instructed and trained in operating techniques designed to prevent accidental spills including but not limited to the following:
 - A) no tank pumping operations are allowed unless attended continuously.
 - B) no tank truck unloading unless driver is in attendance
 - C) all valves and switches of non-operating equipment will be maintained in the off position.
 - D) any suspect condition will be reported to management regardless of accountability

Meetings between management and operating personnel are held to conduct any additional or required training in spill prevention and control, and to evaluate and hear employee suggestions.

REPORTING PROCEDURES

1. For Reporting procedures see APPENDIX II-- EMERGENCY PREPAREDNESS, PREVENTION & RESPONSE: EMERGENCY ACTION And CONTINGENCY PLAN DOCUMENT # EQM-1002

July 1, 2008

Mr. Michael Castor Eastern Plating Company 1200 South Baylis Street Baltimore, Maryland 21224 Re: Training

• Dear Mr. Castor:

As per our conversation, Amasia Enterprises Inc. has scheduled additional Hazardous Waste RCRA training for your level three employees (Supervisors). Included in that training is hazardous waste identification, storage, reporting, inspection and log, as well as a review of your existing SPCC plan and Emergency Contingency Plan (already in existence and on file at both locations).

In addition., since all of your workers have already received PPE and Haz Com Training, Hazardous Waste Training for Level Two employees will be conducted as indicated in the schedule below:

Training Schedule

1) Additional RCRA Training July 18, 2008 (Level One employees as indicated above) (Baylis Location)

2) RCRA Training for Level Two Workers July 30, 2008 (Both Locations)

Feel free to contact me at 410-879-1362, if you require any additional information regarding this matter or the previous training already conducted.

Sincerely

Andy A. Amasia President All persons who participate in the lead abatement and confined space activities will have attended a training program (including yearly updates) as outlined in 29 CFR 1910.120, the OSHA Hazardous Waste Operations and Emergency Response Standard. This training will include at a minimum:

- Regulations
- Toxic hazards
- Fire and explosive hazards
- Emergency procedures
- Medical surveillance
- Decontamination of personnel and equipment
- Hazard recognition and control
- Respiratory protection training
- Personal protective equipment use and selection

- Noise hazard training
- Material Safety Sata Sheets
- Cold and heat stress
- Site Safety
- Site control and work zone

Prior to beginning lead abatement work in an area to be designated a contamination work area or contaminant reduction zone, a record of completion of the above training for all personnel to be assigned to the work activities will be provided to the Site Health and Safety Officer.

EASTERN PLATING HAZARDOUS WASTE OPERATIONS DAY 3

Training Course Outline

29 CRF 1910.120

- 1.0 Hazardous Waste Handling
- 2.0 Video RCRA Operations
 - 1. Hazardous waste handling
 - 2. Hazardous waste liquids handling
- 3.0 EPA Notification Documents
- 4.0 Hazardous Waste Manifests
- 5.0 Hazardous Waste Biannual Report
- 6.0 Summary

EASTERN PLATING HAZARDOUS WASTE OPERATIONS DAY 3

Training Course Outline 29 CRF 1910.120

- 1.0 Hazardous Waste Handling
- 2.0 Video RCRA Operations
 - 1. Hazardous waste handling
 - 2. Hazardous waste liquids handling
- 3.0 EPA Notification Documents
- 4.0 Hazardous Waste Manifests
- 5.0 Hazardous Waste Biannual Report
- 6.0 Summary

2300 Oakmont Road Fallston, MD 21047 410-879-1362

I have attended the TRAINING seminar

•presented by AMASIA ENTERPRISES, INC. on August 22, 2008

for Eastern Plating Company The training included

SPCC Plan, Health and Safety Plan, Hazardous Waste Operation

Training and Requirements.

SIGNATURE

TAME . KA

Keffer

2300 Oakmint Road Fallston, Mili 21 147

410-879-1: 2

I have attended the TRAINING seminar

*presented by AMASIA ENTERPRISES, INC. on August 22, 2008

for Eastern Plating Company The training included

SPCC Plan, Health and Safety Plan, Hazardous Waste Operation

Training and Requirements.

SIGNATURE

NAME:

SILMER

2300 Oakm: at R ad Fallston, M 123 147 410-879-11 2

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SIGNATURE WILL SHIMER

2300 Oakm: at Road Fallston, M.1 22 347 410-879-15 - 2

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2300 Oakm: at Road Fallston, M: #21:47 410-879-1: -2

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Training and Requirements.

SIGNATURE

NAME: (DEORGE MARTINEZ

2300 Oakm: at Road Fallston, M. +21 | 47 410-879-11 | 2

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SPCC Plan, Health and Safety Plan, Hazardous Waste Operation

Training and Requirements.

SIGNATURE

NAME: Wellington Abhilashi

HAZARDOUS WASTE OPERATIONS
DAY 3
October 22, 2008

Attendees Name	Signature
Wellington ABHILASHI	whileshi
MICHAEL SHIMER	nill Shin
BRIAN SHIMER	B. S.
GEORGE MARTINEZ	Ocons Montines
Justin Wright	Inter Wish
Karen Keffer	Karen Kulhu
,	7 777
•	

2300 OAKMONT ROAL FALLSTON, MARYLAND 21041 (410) 879-1361

I have attended the TRAINING seminar presented by AMASIA ENTERPRISES, INC. on October 22, 2008 for Eastern Plating Co.INC.

The training included Hazardous Waste Handling, EPA Notification of Hazardous Waste Activities, Waste Manifests, and Biannual reporting.

SIGNATURE

NAME:

Keffer

2300 OAKMONT ROAL FALLSTON, MARYLAND 2104: (410) 879-136;

I have attended the TRAINING seminar presented by AMASIA ENTERPRISES, INC. on October 23. 2008 for Eastern Plating Co.INC.

The training included Hazardous Waste Handling, EPA Notification of Hazardous Waste Activities, Waste Manifests, and Biannual reporting.

SIGNATURE

NAME: W. ABHILASHI

2300 OAKMONT ROAL FALLSTON, MARYLAND 21041 (410) 879-1881

I have attended the TRAINING seminar presented by AMASIA ENTERPRISES, INC. on October 22, 2008 for Eastern Plating Co.INC.

The training included Hazardous Waste Handling, EPA Notification of Hazardous Waste Activities, Waste Manifests, and Biannual reporting.

SIGNATURE

NAME: 8

. Shimer

2300 OAKMONT ROAL FALLSTON, MARYLAND 2104: (410) 879-136;

I have attended the TRAINING seminar presented by AMASIA ENTERPRISES, INC. on October 23, 2008 for Eastern Plating Co.INC.

The training included Hazardous Waste Handling, EPA Notification of Hazardous Waste Activities, Waste Manifests, and Biannual reporting.

SIGNATURE

NAME: M. Shimer

2300 OAKMONT ROAL FALLSTON, MARYLAND 2104: (410) 879-136:

I have attended the TRAINING seminar presented by AMASIA ENTERPRISES, INC. on October 32. 2008 for Eastern Plating Co.INC.

The training included Hazardous Waste Handling, EPA Notification of Hazardous Waste Activities, Waste Manifests, and Biannual reporting.

SIGNATURE

NAME .

Wright

UNI	ONINGERADOUS	Emergency Respons	e Phone	4. Menifest	Tracking N	n Approved. (lumber) 985	<u> </u>
5. Ge		n vator Site Address	s (if different th	an mailing addre	88)		
Gene	latimore, MD 21224 (410 342 41 4						
	west Environmental Transport, Inc.				000	0005	39
7. Tra	Insporter 2 Company Name	or since the second	CALA STORY	U.S. EPA ID	Number	in the second	er Alle wei,
	Profinental Emerphses, Inc.			U.S. EPA ID	Number		
	iii Spring Grove Avenue (513) 541-18	323		оно	083	3770	10
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Conta	iners	11. Total Quantity	12. Unit Wt./Vol.	13. W	Vaste Codes
	1. RQ, Hazardous Waste Solid, n.o.s.; (Chrome, Nickel)				ſ	007	
<u>x</u>	3, NA 3077, PGH, (D007)	6	DF	900	1		
×	2 CURROSIVE SOLID NOS (METEL CORONIOS, NICHEL ACETATE) 8, UNITSA PG II	/	DF	600	P		
RO	3 WASTE CORROSIVE LIQUID, N.O.S. (NICKEL HYDROX. ALUMINUM HYDROXIDE) 8, UN 1760, PG II	IDE.	DF	55	6	D002	
	X95259 6 X55 ERG # 171 3. X952	6/ / x5	5 ERG	J# 154	•		
	X95260 / X55 ERG# 154	A CAMPAGE OF STREET	132	252			
	GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable						
	Exporter, I cartify that the contents of this consignment conform to the terms of the attached EPA Acknowledge Loarlify that the waste minimization statement identified in 40 CFR 282.27(a) (if I am a large quantity general	ment of Consent.			. ji uquitu .ga ²	apinora ario i a	ii alo i minaly
Gene	rator's/Offeror's Printed/Typed Name Signati	I'm / AL	Tot 1	~ \ \		Mont	. 4
1, 1,	ternational Shipments import to U.S Export from U.S	. Port of e	ntry/exit:				- 143 K
17.,1	sporter signature (for exports only): ransporter Acknowledgment of Receipt of Materials:		ving U.S.				n de la companya de l
Trans	Signat.	" foliant	14			Mont 0 4	n Day / olk
Trans	sporier 2 Printed/Typed Nerne Signati		0			Mon	h Day
18. D	iscrepancy	(the case of the					
18a. i	Discrepancy Indication Space Quantity Type	Residue		Partial Re	jection		Full Rejection
10h	Alternate Facility (or Generator)	Manifest Referen	o Number:	U.S. EPA ID	Mirmhar		· · · .
100.7	Superior daily (or constant)			0.0. Fra 10		والمتوسسان والماران	and Marie 1
Facili 18c. S	ty's Phone: Signature of Alternata Facility (or Generator)		بنستنه	L		Mon	ith Day
L					÷		
19. H	lazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, ar	nd recycling systems)		4.	·		
20. D	esignated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest	except as noted in its	em 18a		HII	\	
	ed/Typed Name Signat		7			Mon	th Day
Thur.	JUSTIN KRERBG						

		OMB#: 2050-0175 Expires 12/31/2003			
MAIL THE COMPLETED FORM TO: Appropriate EPA Jional or State Office.	RCRA SUBJUTLE C SITE IDENTIFICATION				
Reason for Submittal (see instructions on page 10) CHECK CORRECT BOX(ES)	Reason for Submittel: To provide initial notification (to obtain an EPA ID Number for he To provide subsequent actification (to update site identification) As a component of a First RCRA Hazardous Waste Part A Permit As a component of a Revised RCRA Hazardous Waste Part A Permit As a component of the Hazardous Waste Report.	information). Application.			
Site EPA ID Number (see instructions on page 11)	EPA ID Number: MIDID 10613 12115 14153				
3. Site Name (see instructions on page 11)	Name: EASTERN PLATING CO.				
4. Site Location Information (see	Street Address: 1200 South BAYUS S	STREET			
instructions on page 11)	City, Town, or Village: BALTI MORE	State: MARY LAND			
	County Name: BALTIMOR CITY	Zip Code: 2:224			
5. Site Land Type (see instructions on page 11)	Site Land Type: Private County District Federal	☐ Indian ☐ Municipal ☐ State ☐ Other			
6. North American Industry Classification System	А. В.				
**MAICS) Code(s) for the second secon	C. D.	D.			
7. Site Mailing Address (see instructions on page	Street or P. O. Box: 1200 South Bay Li	S START			
12)	City, Town, or Village: BACTIMO				
	State: MARYLAND				
	Country: BALTIMORE CITY	Zip Code: 21224			
8. Site Contact Person (see instructions on page 12)	First Name: MCLVIN MI: L.	Last Name: POLLARD			
	Phone Number: 410- 342-4107	Phone Number Extension:			
9. Legal Owner and Operator of the Site (see	A. Name of Site's Legal Owner: EMTERN: PLATINGCO. TNC.				
instructions on pages 12 and 13}	Owner Type: Private 🔾 County 🗘 District 🗘 Federal	☐ Indian ☐ Municipal ☐ State ☐ Other			
	B. Name of Site's Operator: Michael W. Castor	Date Became Operator (mm/dd/yyyy):			
	Operator Type: Private County District Federal	☐ Indien ☐ Municipal ☐ State ☐ Other			

- ID No	OMB#: 2080-0	176 EXPINSU 15 4
EPA ID No.	iges 13, 14, 15	, and 16)
ructions on p	900	

			-propriate boxes.	see instri	ettoris C.	Tida.	
. Domila	ted Waste Activit	y (Mark 'X' in the a	ppropri ate boxes .	¥.			
Hazardous Wa	ne Activities					all that appry.	
					- marter of 28	LOORS ALDER	
1. Generator of (choose only	Hazardous Waste one of the following	three categorium		u 2 .	Treater, Storer, or D	isposer of Hand	Waste (at
a. LQG: (Greater than 1,000 kg	g/mo (2,200 lbs./mo.)			for this stivity.		
hazard	lous waste, or	(220 - 2,200 lbs./mo.)		04	Recycler of Hazard hazardous waste po	ous Waste (at you emit may be requi	r site) Note: A ired for this activ
C. CESQ	G: Less than 100 kg	mo (220 lbs./mo.) of	non-acute hazardous		Exempt Boller and		
waste			•				
in addition,	indicate other gene	rator activities (checl	k all that apply)	f.	a. Small Quanti		
🗀 d. United	d States Importer of	Hazardous Waste	w *	1	☐ b. Smelting, Me	alting, Refining Fur	nace Exemption
		and radioactive) Gene	rator	□ 6	. Underground inje		
D. Hubranol W.	aste Activities		A CONTRACT OF STATE	C. U	Jsed Oil Activities	None	
		a contract of the contract of	State requistions to	1	. Used Oil Transpo	rter - Indicate Typ	e(s) of Activity(ies)
determine what i	is regulated). Indica	Waste (refer to your te types of universal	Masta Agueraren	1	a. Transporter		
and/or accumula	ited at your site. (c	heck all boxes that a	pply):		🔾 b. Transfer Fac		
		Generated	Accumulated	1	2. Used Oil Process of Activity(les)	or and/or Re-refin	er - Indicate Type(s)
a. Batteries		0	<u> </u>	1	a. Processor		
b. Pesticides				1	D b. Re-refiner		
c. Thermostats			<u> </u>	a:	3. Off-Specification	Used Oil Burner	
d. Lamps	۸	0	ā		4 Haad Oil Eucl Me	rketer - Indicate T	ype(s) of Activity(ies
	/)				• 5 A		
	y)	0	<u> </u>		a. Marketer W	the Directs Shipme oil to Off-Specifical	ent of Off-Specification Used Oil Burner
g. Other (speen)			• •	1			
2. Destination F	acility for Universal	Waste			 b. Marketer W Specification 		e Used Oil Meets the
Note: A hazar	rdous waste permit r	nay be required for th	nis activity.				
11. Description	of Hazardous Wa	stes (see instructio	ons on pages 16 an	d 17)	eg ger og det e Myser skiller er e		
A. Waste Codes for	r Federally Regulate	d Hazardous Wastes in the regulations (e.	Please list the waste g., D001, D003, F007,	codes of t	the Federal hazardor se an additional page	us wastes handled e if more spaces a	at your site. List re needed.
D001	8002	D035		3	D007		
700							
			, ° +	5.		·	
					* :		
	 						
							
L							

		н
	I TA	ı
EPA ID No.	ישו	ı

001 D002 D035 F00	05 D007	
		1 3
		- 3
. Comments (see instructions on page 17)		
3. Certification. I certify under penalty of law that this document and all att ccordance with a system designed to assure that qualified personnel properly ne person or persons who manage the system, or those persons directly responses of my knowledge and belief, true, accurate, and complete. I am aware that he possibility of fine and imprisonment for knowing violations. (see instructions)	y gather and evaluate the informat consible for gathering the informat it there are significant penalties for	tion submitted. Based on my inquiry of tion, the information submitted is, to the
Signature of owner operator, or an Name a	and Official Title (type or print)	Date Signe (mm/dd/yyy
MICHAEL W. C	2A STOR	02/27/20

OMB#: 2050-0175 Expires 12/31/2003

							EPA ID No.	MDD063	21151455
10.	Type of Regu	lated Waste A	ctivity (Mark 'X	in the app	ropriate boxes	See i	nstructions on page	es 13, 14, 15, and	16)
A.	1. Generator o	aste Activities f Hazardous Wa		orias)	111	For It	ems 2 through 6, chec	ck all that apply: 🥻	lone
				•	1		2. Transporter of Haz	ardous Waste	
	hazard b. SQG:	ous waste; or	00 kg/mo (2,200 l /mo (220 - 2,200 l			۵	3. Treater, Storer, or your site) Note: A for this activity.	Disposer of Hazard hazardous waste pe	
			kg/mo (220 lbs./	mo.) of non-a	cute hazardous	O	4. Recycler of Hazard hazardous waste p	lous Waste (at your ermit may be requir	
	,	:		* .			5. Exempt Boiler and	or Industrial Furna	ce
			enerator activitie		ат арріу)		🗖 a. Small Quanti	ty On-site Burner Ex	emption
	d. United	States Importer	of Hazardous Wa	iste			☐ h Smelting Me	alting, Refining Furna	ce Evemption
	🔾 e. Mixed	Waste (hazardo)	s and radioactive	e) Generator	4		, , , , ,		ice Exemption
					······	u	6. Underground Injec	tion Control	
B.	Universal Wa	ste Activities	None			C.	Used Oil Activities	NONE	
1. La	arge Quantity Ha	ındler of Univers	al Waste [refer t	o your State i	regulations to	,	1. Used Oil Transport	ter - Indicate Type(s) of Activity(ies)
	etermine what is nd/or accumulat				generated		a. Transporter		
aı	nu/or accumulat	eu at your site.	(CHECK OIL DOXES	tilat applys.	•		D b. Transfer Faci	lity	
	Demode		Generated		nulated		2. Used Oil Processor of Activity(ies)	r and/or Re-refiner -	Indicate Type(s)
	Batteries		<u>. </u>		ם 3	l	a. Processor		
	Pesticides Thermostats				_ _		☐ b. Re-refiner		
	. Lamps		<u> </u>		- D		3. Off-Specification U	Jsed Oil Burner	· .
	Other (specify)		_		<u> </u>	1	•		
	Other (specify)				_ 		4. Used Oil Fuel Mark	keter - Indicate Type	o(s) of Activity(les)
	. Other (specify)		۵	Ţ	-			o Directs Shipment to Off-Specification	
2 .	. Destination Fac Note: A hazard		al Waste may be required	for this activ	ity.		b. Marketer Wh Specification		sed Oil Meets the
11.	Description o	f Hazardous W	astes (see inst	ructions on	pages 16 and	17)	* · · · • · · •		
A. W	Vaste Codes for I	Federally Regulations are presented	ted Hazardous Wed in the regulation	astes. Please ons (e.g., D00	e list the waste co 1, D003, F007, U	des of 12). Us	the Federal hazardous se an additional page i	wastes handled at y f more spaces are no	our site. List eeded.
1	0001	5002	Do	35	F005		D007		
							· ·		
							,	,	
								<u> </u>	

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR U.S. ENVIRONMENTAL PROTECTION AGENCY SITE NAME: EASTERN PLATING CO., INC. 2001 Hazardous Waste Report MDD 063 215 453 **FORM** WASTE GENERATION **GM** AND MANAGEMENT Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number for instructions specific to each box is provided in parentheses. A. Waste description (page 22) Sec. 1 WASTE METHYL ETHYL KETONE C. State hazardous waste code (page 22) NIA 10011 D1013151 B. EPA hazardous waste code FIGOIS LILL LILL (page 22) 1G 1016 E. Form code D. Source code F. RCRA G. Quantity generated in 2001 (page H. UOM (page 23) radioactive (page 23) (page 23) Management Method code for mixed Source code G25 (page 23) Density (page 24) N/Α H.0611 W 2 0 3 ☐ Yes ibs/gal □ sg Sec. 2 Was any of this waste managed on site? (page 24) □ 1 Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) 1 No (SKIP TO SEC. 3) ON-SITE PROCESS SYSTEM 2 ON-SITE PROCESS SYSTEM 1 NA N/A Quantity treated, disposed, or Quantity treated, disposed, or On-site Management On-site Management Method code (page 24) recycled on site in 2001 (page 25) Method code (page 24) recycled on site in 2001 (page 25) L^{H} A. Was any of this waste shipped off site in 2001 for treatment, disposal, or recycling? (pages 25 and 26) Sec. 3 1 Yes (CONTINUE TO BOX B) ☐ 2 No (FORM IS COMPLETE) D. Total quantity shipped in 2001 B. EPA ID No. of facility to which waste was C. Off-site Management Method code Site 1 shipped (page 26) Shipped to (page 26) (page 26) 10 HD 01813 1377 10110 1-101611 C. Off-site Management Method code D. Total quantity shipped in 2001 B. EPA ID No. of facility to which waste was Site 2 shipped (page 26) Shipped to (page 26) (page 26) LHLLL C. Off-site Management Method code D. Total quantity shipped in 2001 B. EPA ID No. of facility to which waste was Site 3 Shipped to (page 26) (page 26) shipped (page 26) Comments:

BEFORE (ENTER: SITE NAM	COPYING FORM, ATTACH SITE IDENTIFICA	A CHOTECTO	2	U.S. ENVIRONME PROTECTION AGE 2001 Hazardous Wast	ENCY			
FORM GM WASTE GENERATION AND MANAGEMENT								
Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number for instructions specific to each box is provided in parentheses.								
Sec. 1 A. Waste description (page 22) WASTE Corrosive LIQUID, NITTIC ACID / Ammonium Bifluorise								
B. EPA hazardous waste code DOO2								
D. Source (page :	to the second	E. Form code (page 23)	F. RCRA radioactive mixed (page 23)	G. Quantity 23)	generated in 2001 (page	H. UOM (page 23)		
	[H] .1,2,9]	_[w _] 1 0 5	µ/A □ Yes		111411010	Density (page 24)		
Sec. 2	Was any of this waste managed on site? ☐ 1 Yes (CONTINUE TO ON-SITE PROC 2 No (SKIP TO SEC. 3)							
ON-SITE P	ROCESS SYSTEM 1 NA		ON-SITE PROCESS	S SYSTEM 2	N/A			
	anagement Quantity treated, dispo ode (page 24) recycled on site in 200		On-site Management Quantity treated, disposed, or Method code (page 24) recycled on site in 2001 (page 25)					
ſ _Ħ ŢŢ		ا اللا	LHLLL	-	•			
Sec. 3	A. Was any of this waste shipped off site If 1 Yes (CONTINUE TO BOX B)	in 2001 for treatm 2 No (FORM IS CO	ent, disposal, or r (MPLETE)	ecycling? (pa	ges 25 and 26)			
Site 1	B. EPA ID No. of facility to which waste w shipped (page 26)		Management Met to (page 26)	hod code	D. Total quantity shippe (page 26)	d in 2001		
	10141D 101813 131717 1011	<u>o</u>	LH. 1 : 2, 9;		11410			
Site 2	B. EPA ID No. of facility to which waste w shipped (page 26)		ite Management Method code ped to (page 26)		D. Total quantitý shipped in 2001 (page 26)			
		_	LHILLI					
Site 3	B. EPA ID No. of facility to which waste w shipped (page 26)		Management Met I to (page 26)	hod code	D. Total quantity shippe (page 26)	d in 2001		
			LHLLL					
Comment	s: H 129 Neutralization) /STRDILIZA	1+10~ / 3:5po	SAL				

BEFORE C ENTER: SITE NAM	COPYING FORM, ATTACH SITE IDENTIFICAT			2	U.S. ENVIRONMEI PROTECTION AGE 001 Hazardous Wast	INCY			
EPA ID NO	o: MIDID 101631215145	5.3	FORM GM		WASTE GENERA AND MANAGEM				
	Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number for instructions specific to each box is provided in parentheses.								
Sec. 1	Sec. 1 A. Waste description (page 22) HAZARDOUS WASK SOLID (Chromium / NICKEL								
B. EPA hazardous waste code DiOO7 . C. State hazardous waste code (page 22) NA (page 22)									
D. Source (page 2		. Form code (page 23)	F. RCRA radioactive mixed (page 23)	G. Quantity (23)	generated in 2001 (page	H. UOM (page 23)			
(page 23)									
Sec. 2	Was any of this waste managed on site? (part of the same of this waste managed on site? (part of the same of the	•							
ON-SITE P	ROCESS SYSTEM 1 NA		ON-SITE PROCESS	S SYSTEM 2	Alu				
	anagement Quantity treated, dispose ode (page 24) recycled on site in 2001 (On-site Manager Method code (p		Quantity treated, disported on site in 200				
F _H T T	,		(H <u> </u>	•	•	. (page 2e,			
Sec. 3	A. Was any of this waste shipped off site in 5/1 Yes (CONTINUE TO BOX B) □ 2 N	2001 for treatm No (FORM IS CO		ecycling? (pa	ges 25 and 26)				
Site 1	B. EPA ID No. of facility to which waste was shipped (page 26)		Management Met to (page 26)	hod code	D. Total quantity shippe (page 26)	d in 2001			
	(OHID) (0813) (31717) (0:110	ה	(H1113(1)			1100 0			
Site 2	B. EPA ID No. of facility to which waste was shipped (page 26)		Management Met to (page 26)	hod code	D. Total quantity shippe (page 26)	d in 2001			
		ı	[H]			ا.لللا			
Site 3	B. EPA ID No. of facility to which waste was shipped (page 26)		Management Met to (page 26)	hod code	D. Total quantity shippe (page 26)	d in 2001			
]	LH1 1			لــا الــلـــا			
	Comments: W-319 INORGANIC SOLIDS (Chromium, Nickel Solids + Dowders)								

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: EASTERN PLATING CO., INC.
1200 South BAYUS STREET, BAUT

EPA ID NO: MIDID | 1063 | 2115 | 4153



FORM OI

U.S. ENVIRONMENTAL PROTECTION AGENCY

2001 Hazardous Waste Report

OFF-SITE IDENTIFICATION

Instructions: Please read the detailed instr	uctions on the reverse side before completing this fo	m.
A. EPA ID No. of off-site installation or train		
5 11 0 0 0 0 0 0 5 3 3	State of the state	rransport, Juc.
C. Handler type (CHECK ALL THAT APPLY) Generator	D. Address of off-site installation	
☑ Generator ☑ Transporter	Street	-
•	City	State
☐ TSDR facility	Zip L_L_L_l'	
A. EPA ID No. of off-site installation or trail		
0 10 003 377	ENVIRONMENTAL ENTERPRISES, I	uc.
C. Handler type (CHECK ALL THAT APPLY)	D. Address of off-site installation	
☐ Generator	Street 4650 Spring Grove AVENUE	
☐ Transporter	City <u>Cincinnati</u>	State OH
TSDR facility	zip <u>1415121312</u>	
A. EPA ID No. of off-site installation or tra	nsporter B. Name of off-site installation or transporter	,,
Site 3		
C. Handler type (CHECK ALL THAT APPLY)	D. Address of off-site installation	
☐ Generator	Street	
☐ Transporter	City	State
□ TSDR facility	Zip	
A. EPA ID No. of off-site installation or tra	sporter B. Name of off-site installation or transporter	
Site 4		
C. Handler type (CHECK ALL THAT APPLY)	D. Address of off-site installation	
☐ Generator	Street	
□ Transporter	City	State
☐ TSDR facility	Zip	
A. EPA ID No. of off-site installation or tra	sporter B. Name of off-site installation or transporter	
Site 5	·	
C. Handler type (CHECK ALL THAT APPLY)	D. Address of off-site installation	
☐ Generator	Street	
□ Transporter	City	State L
☐ TSDR facility	Zip L	
Comments:		
1		

INSTRUCTIONS FOR FILLING OUT FORM OI – OFF-SITE IDENTIFICATION

WHO MUST SUBMIT THIS FORM

Sites required to file the 2001 Hazardous Waste Report must submit Form OI if:

- Form Ol is required by your State; AND
- The site received hazardous waste from off site or sent hazardous waste off site during 2001.

PURPOSE OF THIS FORM

Form OI documents the names and addresses of off-site installations and transporters.

HOW TO FILL OUT THIS FORM

Form OI is divided into five identical parts. You must fill out one part for each off-site installation to which you shipped hazardous waste, each off-site installation from which you received hazardous waste, and each transporter you used to ship hazardous waste during 2001. If these off-site installations and transporters total more than five, you must photocopy and complete additional copies of the form. Prior to photocopying, place the pre-printed site identification label in the top left-hand corner of the form or, if you did not receive pre-printed labels, enter the site name and EPA Identification Number in this space.

Use the Comments section at the end of the form to clarify any entry (e.g., "Other" responses) or to continue any entry. When entering information in the Comments section, cross-reference the site number and box letter to which the comment refers.

ITEM-BY-ITEM INSTRUCTIONS

Complete Boxes A through D for each off-site installation to which you shipped hazardous waste and each off-site installation from which you received hazardous waste during 2001. Complete Boxes A through C for each transporter you used during the year (address in Box D is not required for transporters).

- Box A: EPA ID No. of off-site installation or transporter
 - Enter the 12-digit EPA ID number of the off-site installation to which you shipped hazardous waste or from which you received hazardous waste. Or, enter the EPA ID number of the transporter who shipped hazardous waste to or from your site. Each EPA ID Number should appear only once. If the off-site installation or transporter did not have an EPA ID number during 2001, enter "NA" in Box A and note the reason in the Comments section.
- Box B: Name of off-site installation or transporter

Enter the name of the off-site installation or transporter reported in Box A.

Box C: Handler type

Check all boxes that apply to the handler type (i.e., generator, transporter, or treatment, storage, or disposal (TSD) facility) of the off-site installation or transporter reported in Box A.

Box D: Address of off-site installation

Enter the address of the off-site installation reported in Box A. If the EPA ID number reported in Box A refers to a transporter, enter "NA" in Box D.